



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
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In reply, please refer to:  
DOH/CWB

**07026PSS.14**  
**DATE: July 17, 2014**  
**NPDES PERMIT NO. HI S000052**

**FACT SHEET: APPLICATION FOR RENEWAL OF NATIONAL POLLUTANT  
DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO  
DISCHARGE TO VARIOUS WATERS OF THE UNITED STATES**

**PERMITTEE: STATE OF HAWAII, DEPARTMENT OF DEFENSE  
HAWAII ARMY NATIONAL GUARD (HIARNG)**

**FACILITY: HIARNG MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4)**

State Maintenance Facility (SMF), Fort Ruger, Oahu, Hawaii  
State Transportation Motor Pool (STMP), Fort Ruger, Oahu, Hawaii  
Unit Training & Equipment Site (UTES), Waiawa, Oahu, Hawaii  
Regional Training Site – Maintenance (RTS-M), Waiawa, Oahu, Hawaii  
Army Aviation Support Facility No. 1 (AASF #1),  
Wheeler AAF, Oahu, Hawaii  
Building 1073, Company B & C 193<sup>rd</sup> Aviation Armory,  
Wheeler AAF, Oahu, Hawaii  
Wahiawa Armory 1/487<sup>th</sup> FA, Wahiawa, Oahu, Hawaii  
Facility Maintenance Shop No. 2 (FMS #2), Wahiawa, Oahu, Hawaii  
HIARNG Kalaeloa, Kapolei, Oahu, Hawaii

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This Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this permit.

### A. Permit Information

The following table summarizes administrative information related to the HIARNG (hereinafter facility).

**Table F-1. Facility Information**

<b>Permittee</b>	State of Hawaii, Department of Defense, HIARNG	
<b>Name of Facility</b>	HIARNG State Maintenance Facility (SMF), Fort Ruger, Oahu State Transportation Motor Pool (STMP), Fort Ruger, Oahu Unit Training & Equipment Site (UTES), Waiawa, Oahu Regional Training Site – Maintenance (RTS-M), Waiawa, Oahu Army Aviation Support Facility No. 1 (AASF #1), Wheeler AAF, Oahu Building 1073, Company B & C 193 <sup>rd</sup> Aviation Armory, Wheeler AAF, Oahu Wahiawa Armory 1/487 <sup>th</sup> FA, Wahiawa, Oahu Facility Maintenance Shop No. 2 (FMS #2), Wahiawa, Oahu HIARNG Kalaeloa, Kapolei, Oahu	
<b>Facility Address</b>	State of Hawaii Department of Defense Office of the Adjutant General 3949 Diamond Head Road Honolulu, HI 96816-4495	
<b>Facility Contact, Title, and Phone</b>	Mr. Karl Motoyama Compliance Manager Telephone: 808-672-1266, Fax: 808-672-1262 Email: karl.motoyama@us.army.mil	
<b>Authorized Person to Sign and Submit Reports</b>	Lieutenant Colonel Marjean R. Stubbett EN, HIARNG Construction and Facilities Management Officer Telephone: 808-672-1530, Fax: 808-672-1529	
<b>Mailing Address</b>	P. O. Box 29968 Honolulu, Hawaii 96820	
<b>Billing Address</b>	Same	
<b>Type of Facility</b>	Municipal Separate Storm Sewer System	
<b>Pretreatment Program</b>	NA	
<b>Reclamation Requirements</b>	NA	
<b>Facility Permitted Flow</b>	Outfall Serial No.	Discharge
	Various Outfalls, as identified in permit application	Storm Water Runoff* Storm Water Associated with Industrial Activity
<b>Receiving Waters</b>	Various Streams, as identified in the permit application	
<b>Receiving Water Types</b>	Streams	
<b>Receiving Water Classification</b>	Class 2 Inland Waters	

\* including certain specified non storm water discharges

1. NPDES Permit No. HI S000052 became effective on December 7, 2006 and expired on November 30, 2011. The Permittee reapplied for an NPDES permit

on November 7, 2011. The Hawaii Department of Health (hereinafter DOH) administratively extended the NPDES permit on December 6, 2011 (retroactive to November 29, 2011), pending the reapplication processing.

2. The Director of Health (hereinafter Director) proposes to issue a permit to discharge to the waters of the State until five (5) years after the date of issuance, and has included in the proposed permit those terms and conditions which he has determined are necessary to carry out the provisions of the Federal Water Pollution Control Act (P.L. 92-500), Federal Clean Water Act (CWA) (P.L. 95-217) and Chapter 342D, Hawaii Revised Statutes.

## **B. Facility Setting**

### **1. Facility Operation and Location**

This MS4 permit shall cover the following HIARNG facilities on the Island of Oahu:

- a. State Maintenance Facility (SMF), Fort Ruger, Oahu

The SMF is located at Fort Ruger at the base of Diamond Head. The SMF provides storage and repair facilities for State Maintenance personnel. Storm water discharges from the MS4 enters the CCH's MS4 and discharges to the Pacific Ocean at Kahala Beach at 21°15'35"N Latitude, 157°47'22"W Longitude.

- b. State Transportation Motor Pool (STMP), Fort Ruger, Oahu

The STMP is located at Fort Ruger at the base of Diamond Head. The STMP provides maintenance for approximately 50 commercial vehicles. Storm water discharges from the MS4 enters the CCH's MS4 and discharges to the Pacific Ocean at Kahala Beach at 21°15'35"N Latitude, 157°47'22"W Longitude.

- c. Unit Training & Equipment Site (UTES), Waiawa, Oahu

Waiawa was one of the many supply depots build by the Navy before WWII. In 1959, the Navy reassigned custody and control of this property to the Army and in turn, the Army reassigned custody to the HIARNG in 1961. The UTES is located at 96-1176 Waihona Street in Pearl City. The UTES provides unit-level maintenance, routine maintenance, complete overhauls of military vehicles and on-vehicular motorized equipment. It consists of an administrative building, two (2) maintenance garages, and hazardous material/storage areas. Storm water discharges from the MS4 enters the CCH's MS4 and discharges to Waiawa Stream at 21°24'24"N Latitude, 157°58'43"W Longitude and 21°24'23"N Latitude, 157°58'43"W Longitude.

d. Regional Training Site – Maintenance (RTS-M), Waiawa, Oahu

The RTS-M is located at 96-1230 Waihona Street in Pearl City. The RTS-M provides classroom and hands-on training for HIARNG personnel. The complex consists of an administration building, garage, and tool room. Storm water discharges from the MS4 enters the CCH's MS4 and discharges to Waiawa Stream at 21°24'24"N Latitude, 157°58'43"W Longitude and 21°24'23"N Latitude, 157°58'43"W Longitude.

e. Army Aviation Support Facility No. 1 (AASF #1), Wheeler AAF, Oahu

Wheeler Field was established in 1922 as the drill grounds for the 17<sup>th</sup> Cavalry, but due to increasing need, the mission was soon changed to support planes used by the U.S. Army's Hawaiian Department. On December 7, 1941, Wheeler Field suffered heavy damage during the attack on Pearl Harbor. After the attack, a new round of construction began, but Wheeler Field soon became obsolete and was transferred to the Air Force a short time later and was renamed Wheeler Army Air Field as we know it today. The Army formally took over the base in 1991 and currently houses two (2) buildings and a large tarmac area for HIARNG. The AASF #1 is located at Building 829. The AASF #1 provides complete maintenance support to aircraft. Storm water discharges from the MS4 enters U.S. Army Garrison Hawaii's MS4 and discharges to Waikele Gulch at 21°28'33"N Latitude, 158°03'00"W Longitude.

f. Building 1073, Company B & C 193<sup>rd</sup> Aviation Armory, Wheeler AAF, Oahu

The offices and operations center in Building 1073 maintain helicopters and provide medium lift helicopters capacity and air movement core support. Storm water discharges from the MS4 enters U.S. Army Garrison Hawaii's MS4 and discharges to Waikele Gulch at 21°28'33"N Latitude, 158°03'00"W Longitude.

g. Wahiawa Armory 1/487<sup>th</sup> FA and Facility Maintenance Shop No. 2 (FMS #2), Wahiawa, Oahu

This parcel is the former site of the Old Depot Road that connected the main railroad line with a plantation camp to the east. In 1976, HIARNG construction this one (1) unit armory and maintenance facility now occupied by FMS #2, the 487<sup>th</sup> Artillery Company, Headquarters 297<sup>th</sup> Supply and Service Battalion, and the 292<sup>nd</sup> Supply and Support Company, Troop E (Air) 19<sup>th</sup> Cavalry. The Wahiawa Armory and FMS #2 are located at 77-230 Kamehameha Highway in Wahiawa. Storm water discharges from the MS4 enters the State Department of Transportation's MS4 and discharges to a concrete ditch at 21°28'50"N Latitude, 158°01'44"W Longitude.

HIARNG also conducts activities at Kalaeloa. However, storm water and runoff

is directed to dry wells. HIARNG requested that Kalaeloa be included as part of this MS4 permit. HIARNG has been informed that their facility at Kalaeloa will be expected to comply with the requirements of this permit.

## **2. Industrial Activities**

The following industrial facilities were identified in the permit application:

- a. CSMS # 1, Fort Ruger
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- b. SMF, Fort Ruger
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- c. STMP, Fort Ruger
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- d. UTES, Waiawa
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- e. RTS-M, Waiawa
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- f. AASF #1, Wheeler AAF
  - National Security (NAICS Code 928110)
  - Other Support Activities for Air Transportation (SIC Code 488190)
  - Other Airport Operations (NAICS Code 488119)
- g. Building 1073, Company B & C 193<sup>rd</sup> Aviation Armory, Wheeler AAF
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)
- h. Wahiawa Armory 1/487<sup>th</sup> FA, Wahiawa
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)

- General Automotive Repair (NAICS Code 811111)
- i. FMS #2, Wahiawa
  - National Security (NAICS Code 928110)
  - General Warehousing and Storage (NAICS Code 493110)
  - General Automotive Repair (NAICS Code 811111)

According to the NPDES application, dated April 28, 2005, all of the listed facilities are required to have coverage for storm water associated with industrial activities based on their NAICS code.

Upon visits to the facilities, it was observed that only AASF #1 conducts industrial activities that are subject to storm water coverage.

The current permit covers the industrial facilities and requires each facility to have a Storm Water Pollution Control Plan (SWPCP) and perform monitoring.

### **3. Receiving Water Classification**

The Pacific Ocean at Kahala Beach is classified by the DOH as Class A Marine, Open Coastal Waters under Hawaii Administrative Rules (HAR), Section 11-54-6. It is the objective of Class A waters that their use for recreational purposes and aesthetic enjoyment be protected. Any other use shall be permitted as long as it is compatible with the protection and propagation of fish, shellfish, and wildlife, and with recreation in and on these waters.

Waiawa Stream and Waikele Gulch are classified by the DOH as Class 2 Inland Waters under HAR, Section 11-54-5. The objective of Class 2 waters to protect their use for recreational purposes, the support and propagation of aquatic life, agricultural and industrial water supplies, shipping, and navigation. The uses to be protected in this class of waters are all uses compatible with the protection and propagation of fish, shellfish, and wildlife, and with recreation in and on these waters.

### **4. Impaired Water Bodies on CWA 303(d) List**

CWA Section 303(d) requires states to identify specific water bodies where water quality standards (WQS) are not expected to be met after implementation of technology-based effluent limitations on point sources.

The 2012 State of Hawaii Water Quality Monitoring and Assessment Report, which includes the 2012 303(d) List of Impaired Water Bodies in the State of Hawaii, was approved by the EPA on September 20, 2013.

According to the report, the receiving waters are classified as follows:

<b>Table F-2. Receiving Water Assessments from the 303(d) List/305(b) Report</b>										
Receiving Water	Wet/Dry Criteria	Pollutant Decisions								Category Codes <sup>1</sup>
		Enterococci	Total Nitrogen	Nitrate+ Nitrite Nitrogen	Total Phosphorus	Turbidity	Chlorophyll a	Ammonia Nitrogen	Other	
Pacific Ocean at Kahala Beach	Dry	Attained	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	---	2,3

Receiving Water	Season	Pollutant Decisions							Category Codes <sup>1</sup>
		Enterococci	Total Nitrogen	Nitrate+ Nitrite Nitrogen	Total Phosphorus	Turbidity	Total Suspended Solids	Other	
Waiawa Stream	Wet	Unknown	Attained	Attained	Attained	Visual	Attained	Trash	2,3,5
	Dry	Unknown	Visual	Visual	Visual	Visual	Unknown	Trash	3,5
Waikale Stream	Wet	Unknown	Not Attained	Not Attained	Unknown	Not Attained	Unknown	---	3,5
	Dry	Unknown	Not Attained	Not Attained	Unknown	Unknown	Unknown	---	3,5

- <sup>1</sup> Category Codes: 2 - Data show some uses attained  
3 - Not enough data to evaluate  
5 - Data show at least one use not attained, TMDL needed.

## 5. Summary of Existing Effluent Limitations and Monitoring Data

Effluent limitations contained in the existing permit for discharges from industrial activities and monitoring data presented in the 2013 annual report are presented in the following table.

**Table F-3. Effluent Limitations – Storm Water Associated with Industrial Activities**

Parameter	Units	Discharge Limitation {1}	Minimum Monitoring Frequency	Type of Sample {2}
Flow	Gallons	{3}	{4}	Calculated or Estimated
Biochemical Oxygen Demand (5-day)	mg/l	{3}	{4}	Composite {5}
Chemical Oxygen Demand	mg/l	{3}	{4}	Composite {5}
Total Suspended Solids	mg/l	{3}	{4}	Composite {5}
Total Phosphorus	mg/l	{3}	{4}	Composite {5}
Total Nitrogen {6}	mg/l	{3}	{4}	Composite {5}
Nitrate+Nitrite Nitrogen	mg/l	{3}	{4}	Composite {5}
Oil and Grease	mg/l	15	{4}	Grab {7}
pH	SU	{8}	{4}	Grab {9}
Toxic Pollutants {10}	µg/l	{11}	{4}	{12}

NOTES:



{1} Pollutant concentration levels shall not exceed the storm water discharge limits or be outside the ranges indicated in the table. Actual or measured levels which exceed those storm water discharge limits or are outside those ranges shall be reported to the Director as required in Section 16.f. of the Standard NPDES Permit Conditions within 30 days after the Permittee becomes aware of the results. The Permittee shall provide the DOH with an explanation of the pollutant origin. Monitoring results shall be submitted on the DMR Form. This requirement shall supersede the immediate reporting requirement in the Standard NPDES Permit Conditions for these limitations only.

{2} The Permittee shall collect samples for analysis from a discharge resulting from a representative storm. A representative storm means a rainfall that accumulates more than 0.1 inch of rain and occurs at least 72 hours after the previous measurable (greater than 0.1 inch) rainfall event.

“Grab sample” means a sample collected during the first 15 minutes of the discharge.

“Composite sample” means a combination of at least two (2) sample aliquots, collected at periodic intervals. The composite shall be flow proportional; either the time interval between each aliquot or the volume of each aliquot must be proportional to the total flow of storm water discharge flow since the collection of the previous aliquot. The Permittee may collect aliquots manually or automatically.

Samples for analysis shall be collected during the first 15 minutes of the discharge and at 15-minute intervals thereafter for the duration of the discharge, as applicable. If the discharge lasts for over an hour, sample collection may cease.

{3} No limitation at this time. Only monitoring and reporting is required.

{4} Each monitoring location shall be monitored at least once during the term of this permit.

{5} If the duration of the discharge event is less than 30 minutes, the sample collected during the first 15 minutes of the discharge shall be analyzed as a grab sample and reported toward the fulfillment of this composite sample specification. If the duration of the discharge event is greater than 30 minutes, the Permittee shall analyze two (2) or more sample aliquots as a composite sample.

{6} The Total Nitrogen parameter is a measure of all nitrogen compounds in the sample (nitrate, nitrite, ammonia, dissolved organic nitrogen, and organic matter present as particulates).

{7} The Permittee shall measure Oil and Grease using EPA Method 1664, Revision A.

{8} For discharge into Class 1 or 2, Inland Waters, the pH shall not deviate more than 0.5 units from ambient conditions and shall not be lower than 5.5 nor higher than 8.0. For discharge into Class A, Marine Waters, the pH shall not deviate more than 0.5 units from a value of 8.1, except at coastal locations where and when freshwater from stream, stormdrain or groundwater discharge may depress the pH to a minimum level of 7.0.

{9} The Permittee shall measure pH within 15 minutes of obtaining the grab sample.

{10} Toxic pollutants, as identified in Appendix D of 40 CFR Part 122 or in HAR, Chapter 11-54, Section 11-54-4, need only be analyzed if they are identified as potential pollutants requiring monitoring in the SWPCP. The Permittee shall test for the total recoverable portion of all metals. If monitoring results indicate that the discharge limitation was equaled or exceeded, the SWPCP shall be amended to include additional BMPs targeted to reduce the parameter which was in excess of the discharge limitation.

{11} Effluent limitations are the acute water quality standards established in HAR, Chapter 11-54, Section 11-54-4. For pollutants which do not have established acute water quality standards, any detected concentration greater than 0.01 mg/l shall be reported.

{12} Cyanide and the volatile fraction of the toxic organic compounds shall be sampled by grab sample. All other pollutants, as identified in Appendix D of the 40 CFR Part 122 or in HAR, Chapter 11-54, Section 11-54-4 shall be sampled by composite sample.

**Table F-4. Monitoring Results – Storm Water Associated with Industrial Activities**

Parameter (Units)	Reported Values								
	CSMS #1	STMP	UTES -1	UTES -2	RTS-M	AASF #1-E	AASF #1-W	WAHRC	FMS #2
Flow (MGD)	0.967	0.629	0.189	0.202	0.084	0.229	0.329	0.239	0.160
Biochemical Oxygen Demand (5-day) (mg/l)	< 4	3.2	6.7	11.4	4.6	3.8	< 4.0	2	2.7
Chemical Oxygen Demand (mg/l)	10.7	15	139	38.4	53	32.3	6.2	8.5	39.4
Total Suspended Solids (mg/l)	9	10	174	67	53	6.5	< 5.0	7.5	< 5
Total Phosphorus (mg/l)	0.074	0.274	0.855	0.158	0.222	0.167	0.027	0.009	0.058
Total Nitrogen (mg/l)	0.53	0.76	1.15	0.78	1.19	0.76	0.75	0.47	0.87
Nitrate+Nitrite Nitrogen (mg/l)	0.12	0.223	0.219	0.139	0.098	0.093	0.108	0.03	0.314
Oil and Grease (mg/l)	< 5.6	< 5.0	1.2	< 5.5	1	< 5.1	< 5.1	< 5.1	< 5.2
pH (SU)	7.94	7.26	7.90	7.82	7.94	7.4	7.66	7.82	6.52
Turbidity (NTU)	2.02	10.41	80.6	57.7	20.7	13.7	2.4	6.4	6.19
Ammonia Nitrogen (mg/l)	0.04	< 0.050	0.118	0.091	0.05	< 1.0	< 1.0	< 1	< 1
Dissolved Oxygen (mg/l)	7.32	5.44	5.10	4.10	4.16	6.60	6.60	6.70	6.10
Temperature (°C)	25.6	21.3	31	29.3	28.3	25.8	21.6	24.7	26.3
Salinity (ppt)	0.02	0.01	0.03	0.02	0.02	0.03	0.02	0.01	0.02

**Table F-5. Monitoring Results – Total Metals Analyzed at CSMS #1**

Parameter (Units)	Reported Values	Water Quality Standard (Chronic, Salt Water)
Aluminum (µg/l)	73.9	ns
Antimony (µg/l)	0.606	ns
Arsenic (µg/l)	0.23	69
Beryllium (µg/l)	< 0.02	ns
Cadmium (µg/l)	0.251	43
Chromium VI (µg/l)	0.51	1100
Copper (µg/l)	<b>3.21</b>	2.9
Iron (µg/l)	176	---
Lead (µg/l)	1.01	140
Nickel (µg/l)	0.79	75
Selenium (µg/l)	< 1	300
Silver (µg/l)	0.006	2.3
Thallium (µg/l)	< 0.02	710

**Table F-5. Monitoring Results – Total Metals  
Analyzed at CSMS #1**

Parameter (Units)	Reported Values	Water Quality Standard (Chronic, Salt Water)
Zinc (µg/l)	19.4	95

Bold indicates exceedance of the water quality standard.

## **6. Compliance History**

HIARNG's compliance with the NPDES permit has not been evaluated and HIARNG has not been audited yet. HIARNG has submitted annual reports and SWMPs in accordance with the current permit.

## **7. Planned Changes**

No planned changes were declared at the time of application. During a site visit of the facilities on February 18 & 19, 2014, HIARNG notified DOH that HIARNG would be vacating the CSMS #1 facility in Diamond Head Crater. HIARNG has vacated the CSMS #1 facility. MS4 and industrial storm water requirements have been removed from the proposed permit as a result.

## **C. Proposed Determinations**

This permit contains the same goals as the previous permit but contains more specific requirements for the Permittee to achieve the intended goals.

### **1. General Requirements**

The general requirements, specified in Part A., set the framework for Permittee compliance with the draft permit. The Permittee shall comply with its existing Storm Water Management Program (SWMP) Plan until submittal of the revised plan. The purpose of this requirement is to clarify DOH's expectations during which the SWMP Plan is being revised per the requirement of this permit and to prevent any gap in time where an SWMP Plan is not being implemented.

This part also contains other basic requirements, including requiring a copy of the SWMP Plan be retained at a location designated in its SWMP and the inclusion of the certification statement with all submittals, and provides the EPA address where information shall be submitted. This part further requires that the Permittee allows the public an opportunity to review and comment on the different plans required by the SWMP and clarifies the DOH's expectations for the Permittee to address all of DOH's comments on required submittals.

### **2. Discharge Limitations**

Discharge Limitations listed in Part B. of the permit specify that the Permittee shall effectively prohibit non-storm water discharges through its MS4 into State

waters (per Section 402(p) of the Act). "Effectively prohibit" means that a non-storm water discharge shall be specifically regulated by an NPDES permit, or that the discharge is not considered a waste, or that the discharge does not contain constituents of concern which would necessitate an NPDES permit. NPDES permitted discharges and certain non-storm water discharges identified in Part B.2. of this permit may be allowed into the MS4 provided that such discharges will not contain pollutants in amounts that will result in a violation of an applicable water quality standard.

As required by Section 402(p) of the Act and 40 CFR §122.26(d)(2)(iv), the discharge of pollutants must be reduced to the "maximum extent practicable (MEP)." The activities described in the SWMP shall meet this MEP control standard.

The discharge of pollutants from the Permittee's industrial facilities shall be consistent with the BAT/BCT requirement of the Act.

### **3. Receiving Water Limitations**

Receiving Water Limitations listed in Part C of the draft permit are restated from HAR, Section 11-54-4(a). In accordance with HAR, Section 11-54-3(a), existing storm water discharges into State Waters are allowed provided such discharges meet the basic water quality criteria listed in HAR, Section 11-54-4 (refer to Part C.1. of the permit). The discharge shall not cause or contribute to a violation of any of the applicable beneficial uses or water quality objectives contained in HAR, Chapter 11-54, titled "Water Quality Standards." This part sets a minimum frequency for visual inspections of State waters to provide guidance to the Permittee for development of their inspection program, and also to create an enforceable requirement.

### **4. Storm Water Management Plan**

Storm Water Management Plan (SWMP) listed in Part D. of the permit contains six (6) minimum control measures as listed below.

- a. Public Education and Outreach
- b. Public Involvement/Participation
- c. Illicit Discharge Detection and Elimination
- d. Construction Site Runoff Control

Requirements within this section apply to all public construction projects and private projects which discharge storm water to the Permittee's MS4.

e. Post-Construction Storm Water Management in New Development and Redevelopment

This section includes Low Impact Development (LID) requirements for addressing post-construction BMPs.

f. Pollution Prevention/Good Housekeeping

This section requires the Permittee to develop and submit to DOH a trash control plan with an implementation schedule to reduce trash discharges from the MS4 to zero. Numerous waterbodies on Oahu are currently listed on the State's CWA section 303(d) as impaired due to trash, and the proposed requirement is intended to address this problem. Similar requirements have recently been adopted for trash control in the City and County of Honolulu's MS4 Permit, State DOT's MS4 Permit, and in the State of California. The DOH recommends that the Permittee review these requirements in developing a practicable plan and implementation schedule.

This section also requires the development of a maintenance plan for vegetated portions of the drainage system used for erosion and sediment control and LID features and the submittal of an Action Plan to address erosion at outlets to be submitted within one (1) year of the effective date of this permit and implemented within five (5) years.

g. Industrial and Commercial Activities Discharge Management Program

This section requires implementation of BMPs for industrial and commercial facilities through the issuance of a permit or written equivalent approval process for drainage connections and discharge of surface storm water runoff into the MS4. This section also specifies inspection frequencies for industrial and commercial facilities.

Under this section, the Permittee is required to review and approve Storm Water Pollution Control Plans for industrial activities, similar to the Plan review and approval process for construction activities

The Permittee must also establish and implement enforcement policies for facilities which have failed to comply with its requirement and rules for penalties.

h. Modifications

This section requires the Permittee to revise the SWMP, as necessary, if any discharge limitation or water quality standard is exceeded. All modifications to this permit shall be made pursuant to any applicable requirements in the DOH's Standard NPDES Permit Conditions.

## **5. Industrial Facilities**

The storm water runoff from industrial facilities within the installations covered by this individual MS4 permit are subject to the Storm Water Discharges Associated With Industrial Activity NPDES requirements under 40 CFR Part 122.26(b)(14)(ii). The storm water discharge from the facility can be covered under DOH's NPDES general permit for storm water associated with industrial activity, however, as in the current permit, it is included in this individual MS4 permit in Part E. Nine (9) industrial facilities were identified in the application, however, only one (1) is required to have coverage for storm water associated with industrial activity.

Accordingly, the proposed storm water runoff discharge conditions and requirements for storm water associated with industrial activity are incorporated in the draft permit based on Appendix B of HAR, Chapter 11-55. The Permittee is also required to prepare and implement a SWPCP. The storm water requirements are retained from the current permit. Future industrial facilities may be covered under this individual MS4 permit upon submission of MS4 NPDES Individual Permit - Industrial Storm Water Discharge Notification Form.

If the industrial facilities listed in Part E.1. of the proposed permit qualify for Conditional "No Exposure" Exclusion from NPDES Storm Water Associated with Industrial Activity permitting, the Permittee may submit the "MS4 NPDES Individual Permit – Industrial Storm Water No Exposure Notification Form", following the procedure listed in Part E.3. of the proposed permit.

The Permittee will not be required to sample storm water runoff according to Part F.2. of the proposed permit upon submittal of the "MS4 NPDES Individual Permit – Industrial Storm Water No Exposure Notification Form".

## **6. Monitoring Requirements**

a. The draft permit includes the following monitoring program objectives:

- Part F.1.a.(1) Assess compliance with this permit (including TMDL Implementation & Management (I&M) Plans and demonstrating consistency with WLAs, if required);
- Part F.1.a.(2) Measure the effectiveness of the Permittee's SWMP;
- Part F.1.a.(3) Assess the overall health based on the chemical, physical, and biological impacts to receiving waters resulting from storm water discharges and an evaluation of the long term trends;
- Part F.1.a.(4) Characterize storm water discharges;

- Part F.1.a.(5) Identify sources of specific pollutants
- Part F.1.a.(6) Detect and eliminate illicit discharges and illegal connections to the MS4; and
- Part F.1.a.(7) Assess the water quality issues in watershed resulting from storm water discharges to receiving waters.

Annual Monitoring Plan is due on June 1st, one (1) month before the end of the fiscal year. Part F.1.b. lists the Plan's minimum requirements.

b. Industrial Facilities

Part F.2. specifies the monitoring parameters for Industrial Facilities. Discharge Monitoring Report (DMR) requirements are specified in Part G.2.b.(6). DMRs shall be included in the Annual Monitoring Report and submitted via NetDMR once established by the DOH.

## **7. Reporting Requirements**

a. Annual Report

Most of the information specified in the end-of-year report is required by 40 CFR §122.42(c). The Annual Report is due on January 1<sup>st</sup>, covering the previous fiscal year.

b. Annual Monitoring Report

The Annual Monitoring Report is due on January 1<sup>st</sup>, to be included in the Annual Report.

Discharge Monitoring Reports (DMRs) for Municipal Industrial Facilities shall be included in the Annual Monitoring Report. A DMR must be submitted for the facility which is scheduled to be monitored even if sampling was not conducted. An explanation as to why sampling was not conducted shall be explained with the submittal.

## **8. Summary of Deadlines**

The Draft Permit includes a Summary of Deadlines in Part H. of the permit.